

**United States District Court  
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**PLAINTIFF’S RESPONSE IN OPPOSITION TO DEFENDANT’S  
MOTION TO EXCLUDE THE “BLACK BOOK”**

Sigrid McCawley  
BOIES SCHILLER FLEXNER LLP  
401 E. Las Olas Blvd., Suite 1200  
Ft. Lauderdale, FL 33301  
(954) 356-0011

Plaintiff, Virginia Giuffre, by and through her undersigned counsel, hereby files this response in opposition to Defendant's motion *in limine* (DE 679).

## PRELIMINARY STATEMENT

On February 6, 2017, the Court requested a hearing on the admissibility of the “black book,” setting oral argument for this coming Thursday, March 16. Ms. Giuffre and Defendant each filed competing motions *in limine* on the issue on March 3. In the interest of brevity before the Court, Ms. Giuffre adopts all of the facts and arguments from Plaintiff’s Motion in Limine to Admit the “Black Book” as Evidence at Trial (DE 683), and incorporates them by reference.

A horizontal bar chart with 14 bars. The bars are arranged in a descending order of total length. Most bars are black, but the 10th, 12th, and 13th bars have a light gray segment at the beginning. The 12th bar has a very small gray segment, while the 10th and 13th bars have larger gray segments. The 14th bar is a single black bar.

Bar Index	Segment Color	Approximate Length (Relative)
1	Black	95
2	Black	98
3	Black	99
4	Black	99
5	Black	90
6	Black	100
7	Black	92
8	Black	96
9	Black	45
10	Light Gray	10
11	Black	90
12	Light Gray	5
13	Light Gray	15
14	Black	100



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

For all the foregoing reasons, the Court should deny Defendant's motion *in limine*, and grant Ms. Giuffre's motion to admit the black book at trial.

Respectfully Submitted,

By: /s/ Sigrid McCawley  
 Sigrid McCawley (Pro Hac Vice)  
 Meredith Schultz (Pro Hac Vice)  
 Boies Schiller Flexner LLP

401 E. Las Olas Blvd., Suite 1200  
Ft. Lauderdale, FL 33301  
(954) 356-0011

David Boies  
Boies Schiller Flexner LLP  
333 Main Street  
Armonk, NY 10504

Bradley J. Edwards (Pro Hac Vice)  
FARMER, JAFFE, WEISSING,  
EDWARDS, FISTOS & LEHRMAN, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
(954) 524-2820

Paul G. Cassell (Pro Hac Vice)  
S.J. Quinney College of Law  
University of Utah  
383 University St.  
Salt Lake City,  
UT 84112(801) 585-5202<sup>1</sup>

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<sup>1</sup> This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 15, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

Laura A. Menninger, Esq.  
Jeffrey Pagliuca, Esq.  
HADDON, MORGAN & FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, Colorado 80203  
Tel: (303) 831-7364  
Fax: (303) 832-2628  
Email: [lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)  
[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)

/s/ Sigrid McCawley  
Sigrid McCawley, Esq.